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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

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IN RE: Keiara S.Seldon Chambers, Debtor

Chapter 7  
Case# 22-32896

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Exeter Finance LLC

v.

Keiara S. Seldon Chambers

**Answer to Motion of Exeter Finance LLC  
For Relief from Automatic Stay**

COMES NOW the Debtor Keiara S.Seldon Chambers by counsel, Pia J. North, Esq. and answers as follows:

1. Debtor admits the allegations contained in Paragraphs 1-3 of the plaintiff's motion.
2. Debtor does not have sufficient information to either admit or deny allegations other than those paragraphs specified previously. As such, all allegation not specifically admitted are presumed to be denied and the Debtor demands strict proof thereof.
3. Ms. Seldon Chambers' Statement of Intention states that her intention is to "*Negotiate terms & reaffirm*".
4. Prior to filing for bankruptcy relief, the debtor was being garnished. The garnishment caused her to fall behind on her car payments. Debtor's counsel sent notices on the Rollingwood Apartments garnishment asking that the funds be returned to the debtor. More than \$2,500 is being held on that garnishment.
5. The debtor anticipates receiving over \$2,500 in garnished funds following the Trustee meeting on November 14, 2022. The debtor will have the ability to catch up the payments she missed at that time. As of the date this motion was filed, the arrearage was only \$1,688.78.
6. Movant has not shown the irreparable harm necessary to justify lifting the stay. Even if Movant is entitled to relief from the stay, the stay should not be terminated. The Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, the Debtor prays that the plaintiff's motion be dismissed, that this matter be continued to November 23, 2022 to allow Ms. Seldon Chambers an opportunity to bring the account current upon the return of the garnished funds; and that the Debtor be granted all other relief as this Court deems just and proper as well as the right to enlarge and or modify the response to the motion if necessary.

Respectfully Submitted:  
Keiara S.Seldon Chambers

By: /s/ Pia J. North  
Pia J. North, Esq. #29672  
North Law  
5913 Harbour Park Drive  
Midlothian, VA 23112  
(804) 739-3700

CERTIFICATE OF SERVICE

I hereby certify that on 11/1/2022, I served by ECF or mailed the foregoing document by electronic mail or first-class mail, postage pre-paid to the United States Trustee at 701 E. Broad Street, Room 4304, Richmond, VA 23219; the trustee, the Chapter 13 Trustee ECF; and attorney for Exeter Finance LLC.